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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. CR 13-574 WHA
	)	
Plaintiff,	)	STIPULATION AND ORDER EXCLUDING TIME
	)	
v.	)	
	)	
MARTIN BUCIO-AYALA,	)	
ARNOLDO MADRIGAL-ROSALES,	)	
a/k/a Nonin Rosales, a/k/a Noni,	)	
	)	
Defendants.	)	

UNITED STATES OF AMERICA,	)	CASE NO. CR 13-575 WHA
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
MIGUEL MONTES-TORRES,	)	
a/k/a Jose,	)	
JORGE HERNANDEZ-PENA,	)	
a/k/a Javier Herrera-Tafolla,	)	
	)	
DEFENDANTS.	)	

On November 19, 2013, at 2:00 p.m., defendants Martin Bucio-Ayala, Arnoldo Madrigal Rosales

STIPULATION AND ORDER EXCLUDING TIME  
CR 13-574 WHA, CR 13-575 WHA

1 and Jorge Hernandez-Pena appeared before the District Court through counsel. Miguel Montes-Torres  
 2 failed to appear in person, though his counsel was present. The parties agreed to return before the Court  
 3 on December 17, 2013 at 2:00 p.m. Prior to the hearing, the government provided additional discovery  
 4 to defense counsel. The government anticipates providing additional discovery to defense counsel prior  
 5 to December 17, 2013. The parties agree that defense counsel require time to review the discovery and  
 6 discuss it with their clients. Therefore, the parties agreed that time should be excluded between  
 7 November 19, 2013 and December 17, 2013 in order to ensure the effective preparation of counsel. 18  
 8 U.S.C. § 3161(h)(7)(B)(iv).

9 DATED: October 2, 2013

Respectfully submitted,

10 MELINDA HAAG  
 11 United States Attorney

12 /s/  
 13 FRANK J. RIEBLI  
 Assistant United States Attorney

14 /s/ Frank Riebli with permission  
 15 SARA RIEF  
 16 Attorney for Martin Bucio-Ayala


17 /s/ Frank Riebli with permission  
 18 ALAN DRESSLER  
 19 Attorney for Arnoldo Madrigal Rosales

20 /s/ Frank Riebli with permission  
 21 ADAM GASNER  
 22 Attorney for Jorge Hernandez-Pena

23 /s/ Frank Riebli with permission  
 24 STEVE TEICH  
 25 Attorney for Miguel Montes-Torres

1 For the reasons stated above, the Court finds that the exclusion of time from November 19, 2013  
2 through and including December 17, 2013 is warranted and that the ends of justice served by the  
3 continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §  
4 3161(h)(7)(A). The failure to grant the requested continuance would deny the defendant effective  
5 preparation of counsel, and would result in a miscarriage of justice. 18 U.S.C. § 3161(h)(7)(B)(iv).  
6 SO ORDERED.

7 DATED: ~~November~~ \_\_\_\_\_, 2013.  
8 December 2

  
HONORABLE WILLIAM H. ALSUP  
United States District Court Judge